

OSHA STANDARD INTERPRETATIONS

OSHA requirements are set by statute, standards and regulations. Interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. Enforcement guidance may be affected by changes to OSHA rules.

Fall protection for walk/work along bridge decks with a 32-inch-high barrier wall

Standard: 1926.501(b)(1); 1926.502(b); 1926.502(f)

Date of response: Sept. 3, 2013

Mr. Larry Fortier, CRSP
District HSE Manager, PCL Constructors Inc.
Transportation Infrastructure Group
3810 Northdale Boulevard, Suite 200
Tampa, Florida 33624

Dear Mr. Fortier:

In your letter you discussed safe guarding for employees required to work next to finished concrete barriers commonly used in highway construction. Most of these barriers are only 32 inches high. Employees could be exposed to falls of 6 feet or more when performing ancillary tasks, such as painting or removal of concrete curing material. You stated that the vast majority of Department of Transportation contracts through the Federal Highway Administration have contract specifications that do not permit the use of systems such as anchorages for a personal fall protection system if there is a need to penetrate the surface of decks or barrier walls. While it's an accepted practice to use job-fabricated wooden built-up rail systems, you point out that this could entail tens of thousands of circular saw cuts. You contend that exposure to cuts and ergonomic considerations of these systems create greater hazards to employees than that of a fall exposure. Given your scenario ... you asked the following question:

QUESTION: *Would the use of high-visibility warning stripes placed on the decking during construction, and subsequent use of permanent pavement markings in conjunction with training and enforcement, meet the requirements for protection of workers having to walk and/or travel along decks between the offset markings when the edges are protected with a finished 32-inch-high barrier wall?*

Answer: No. Using a 32-inch-high concrete barrier to serve as a guardrail to protect employees doesn't comply with minimum top-edge requirement of the guardrail system to be 42 inches high plus or minus 3 inches.

The fabricated plywood saddle system described in your letter is one of many systems that can be used. On May 10, 2013, we briefly discussed alternatives such as c-clamp guardrail systems that are easily transportable and available for rent. We also discussed OSHA's alternative uses of warning line systems meeting the requirements defined in 29 CFR 1926.502(f)(2) providing its use maintains a "no entry" 15 foot setback from an edge or hole 6 feet or more above a lower level. You indicated that your employees would need to work within the 15 foot restriction and thus a warning line system would be infeasible.

James G. Maddux, Director
Directorate of Construction

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